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Via Email submittal

May 8, 2020

South Carolina Department of Health and Environmental Control
Bureau of Air Quality
Technical Management Section
2600 Bull Street
Columbia, SC 29201

**RE: Annual Compliance Certification
April 1, 2019 — March 31, 2020 Reporting Period
Magellan Terminals Holdings, LP—North Augusta I Terminal
Air Permit No. TV-0980-0015**

Enclosed please find the Title V Annual Compliance Certification for the Magellan Terminals Holdings, L.P. (MTH)—North Augusta I Terminal. The period for this report is April 1, 2019 to March 31, 2020. No deviations are being reported for the compliance period.

If you have any questions, please contact me at 918-574-7131.

Sincerely,

Teri S. Holmes

Teri S. Holmes
Senior Air Specialist

Enclosure

File: S:\EHSS\Environmental\SC\MTH-North_Augusta_SC_I\Air\working\Compliance Reports\Annual Compliance Certifications\2020

Cc: US EPA, Region 4, Air Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303-8960



BUREAU OF AIR QUALITY TITLE V ANNUAL COMPLIANCE CERTIFICATION

A. GENERAL INFORMATION	
1. Identifying Information	
Source or Company Name	Magellan Terminals Holdings, L.P
Mailing address: Street or P.O. Box	222 Sweetwater Road
City	North Augusta
State	South Carolina
ZIP	29860
Contact Person	Zach Hauser
Title	Operations Supervisor
Telephone	470-786-7381
Extension	N/A
Fax	NA
Part 70 Permit Number	0980-0015
2. Reporting Period	
Period Beginning to Period Ending	4/1/19 – 3/31/20

B. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS	
1. Responsible Official	
Last Name	Krshka
First Name	Kyle
Middle Name	
Title	Director of Operations
Street or P.O. Box	One Williams Center, MD-28
City	Tulsa
State	Oklahoma
ZIP	74172
Telephone	(918) 574-7560
Extension	N/A
Fax	N/A
2. Certification of Truth, Accuracy and Completeness	
I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.	
Name (signed)	<i>Kyle Krshka</i>
Name (printed or typed)	Kyle Krshka
Date	5/6/2020

C. COMPLIANCE STATUS OF EACH PERMIT TERM OR CONDITION & METHODS USED TO DETERMINE COMPLIANCE

Use the table below to indicate the compliance status of each permit term or condition and the methods used to determine compliance. Copy this page as many times as needed to cover all permit terms or conditions.

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 1.A – 1.E (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 2.0 (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.A – 3.C (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.D, Condition 3.D.1	Facility Wide		X	A check for permit fees was mailed to the Department on 9/10/2019.
Part 3.E, Condition 3.E.1	Facility Wide		X	The Department did not request any additional information during this reporting period.
Part 3.F – 3.H (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.I. Condition 3.I.1	Facility Wide		X	No emergency events as defined in 61-62.70.6(g) occurred during the reporting period.
Part 3.I. Condition 3.I.2	Facility Wide		X	No emergency events as defined in 61-62.70.6(g) occurred during the reporting period.
Part 3.I. Condition 3.I.3 (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.J – 3.K (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.L, Condition 3.L.1(<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.L, Condition 3.L.2	Facility Wide		X	No emission allowances were exceeded during the reporting period. This was determined through review of stack test data, parametric monitoring records, leak log records, semi-annual preventative maintenance records, control equipment maintenance records, tank seal inspections, and roof landing logs.
Part 3.M – 3.P (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 3.Q, Condition 3.Q.1	Facility Wide		X	Department representatives are allowed access to the premises at all times; including the last regional inspection that was performed on January 23,2018.
Part 3.R, Condition 3.R.1	Facility Wide		X	Record review.
Part 3.R, Condition 3.R.2	Facility Wide		X	Record review.
Part 3.S, Condition 3.S.1	Facility Wide		X	Review of stack test report.
Part 3.T, Condition 3.T.1	Facility Wide		X	This facility was not required to submit a compliance schedule during this reporting period.
Part 3.U (<i>Informational</i>)	N/A	N/A	N/A	N/A

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 3.V, Condition 3.V.I	Facility Wide		X	On April 29, 2019 Magellan submitted a request to change the responsible official to Kyle Krshka.
Part 3.V, Condition 3.V.2	Facility Wide		X	Magellan has not submitted a request for operational flexibility but will in the future if needed.
Part 4.0, Condition 4.1 (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 4.0, Condition 4.2	Facility Wide		X	A malfunction of air pollution control equipment or system, process upset, or other equipment failure resulting in discharges of air contaminants for greater than one (1) hour did not occur during the reporting period.
Part 4.0, Condition 4.3	Facility Wide		X	The last required emissions report was submitted electronically on March 14, 2018. Receipt confirmation was received.
Part 4.0, Condition 4.4	Facility Wide		X	No open burning occurred during the reporting period.
Part 4.0, Condition 4.5	Facility Wide		X	Hazardous Air Pollution Conditions, as defined in 61-62.4(1) were not experienced during the reporting period.
Part 4.0, Condition 4.6	Facility Wide		X	Fugitive dust was not allowed to leave property boundaries during the compliance period.
Part 4.0, Condition 4.7	Facility Wide		X	Magellan did not have asbestos abated during the reporting period.
Part 4.0, Condition 4.8	Facility Wide		X	Magellan did not have asbestos abated during the reporting period.
Part 4.0, Condition 4.9	Facility Wide		X	Magellan uses professional contractors when dealing with refrigerants.
Part 4.0, Condition 4.10	Facility Wide		X	The facility maintains a list of insignificant activities.
Part 4.0, Condition 4.11	Facility Wide		X	Record review.
Part 4.0, Condition 4.12	Facility Wide		X	Record review.
Part 5.A (<i>Informational</i>)	N/A	N/A	N/A	N/A
Part 5.B, Condition 5.B.1	01, 02, 03, 05, 06, 07		X	Record review of permit modifications as required.
Part 5.B, Condition 5.B.2	01, 02, 03, 05, 06, 07		X	Records are maintained on site for at least 5 years and available to Department representatives upon request.
Part 5.B, Condition 5.B.3	01		X	No source testing was conducted during the compliance period.

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		Intermittent Compliance	Continuous Compliance	
Part 5.B, Condition 5.B.4	01		X	The CMS on the VCU consists of a programmable logic controller (PLC) which assesses whether the vapor valve is open, whether the air assist blower is open or on, and whether a flame is present on the pilot. We ascertain that we are compliant in that if any one of those three (3) steps are not present, the rack shuts down. All shutdowns are recorded on a log sheet at the facility.
Part 5.B, Condition 5.B.5	01		X	Gauges are readily accessible and easily read. Monitoring parameter readings and inspection checks are maintained in logs along with corrective action taken when deviations occur. Each incidence of operation outside of operational range, including date and time, cause, and corrective action taken is recorded and kept on site. Semiannual report dated April 29, 2020 (for the semi-annual reporting period October 1, 2019 – March 31, 2020) was submitted showing no deviations relative to operational ranges for the reporting period.
Part 5.C.01a (<i>Informational</i>)	01	N/A	N/A	N/A
Part 5.C.01b (<i>Informational</i>)	CD-0002	N/A	N/A	N/A
Part 5.C.01c, Condition 01.1	L01/ CD-00002		X	<u>Limits/Standards:</u> Compliance with the 20% opacity limit was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records are kept on preventive maintenance checks, repairs, and downtime. No further monitoring is required.
Part 5.C.01c, Condition 01.2	L01/ CD-00002		X	<u>Limits/Standards:</u> Compliance with the vapor control system and VCU was determined as listed below. <u>Testing:</u> The VCU was tested on June 5, 2019. <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review and system design. The loading rack is equipped with a VCU that controls captured vapors. The VCU flame presence is monitored and is set up with an interlock system that will restrict truck loading if the flame presence is not observed. Records are kept on preventive maintenance checks, repairs, and downtime. No further monitoring is required.

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		Intermittent Compliance	Continuous Compliance	
Part 5.C.01c, Condition 01.3	L01/ CD-00002		X	<u>Limits/Standards:</u> 35 mg/L for the VCU emissions. Pressure-vacuum vent and delivery truck pressure limit of 4,500 pascals. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Tank truck vapor tightness records are kept on file. An electronic system allows only trucks with current tightness records to load. Monthly leak inspections are kept on file. VCU maintenance records are kept on file. System design for truck pressure limit of 4,500 pascals is tested during stacktesting.
Part 5.C.02a (<i>Informational</i>)	02	N/A	N/A	N/A
Part 5.C.02b (<i>Informational</i>)	02	N/A	N/A	N/A
Part 5.C.02c, Condition 02.1	02		X	<u>Limits/Standards:</u> Compliance with the 40% opacity limit was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Only VOC emissions from tank. No monitoring is required.
Part 5.C.02c, Condition 02.2	02		X	<u>Limits/Standards:</u> Compliance with the Standard 5.0, Part O fixed roof tank requirements and routine tank inspections were determined as listed below: <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of out-of-service tank seal inspections, monthly through-the-roof tank inspections, throughputs, and monthly storage temperatures and vapor pressures.
Part 5.C.03a (<i>Informational</i>)	03	N/A	N/A	N/A
Part 5.C.03b (<i>Informational</i>)	03	N/A	N/A	N/A

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		Intermittent Compliance	Continuous Compliance	
Part 5.C.03c, Condition 03.1	03		X	<u>Limits/Standards:</u> Compliance with the 40% opacity limit was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Only VOC emissions from tank. No monitoring is required.
Part 5.C.03c, Condition 03.2	03		X	<u>Limits/Standards:</u> Compliance with the Standard 5.0, Part O fixed roof tank requirements and routine tank inspections were determined as listed below: <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of out-of-service tank seal inspections, monthly through-the-roof tank inspections, throughputs, and monthly storage temperatures and vapor pressures.
Part 5.C.05a (<i>Informational</i>)	05	N/A	N/A	N/A
Part 5.C.05b (<i>Informational</i>)	05	N/A	N/A	N/A
Part 5.C.05c, Condition 05.1	05		X	<u>Limits/Standards:</u> Compliance with the 40% opacity limit was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Only VOC emissions from tank. No monitoring is required.
Part 5.C.05c, Condition 05.2	05		X	<u>Limits/Standards:</u> Compliance with the Standard 5.0, Part O fixed roof tank requirements and routine tank inspections were determined as listed below: <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of out-of-service tank seal inspections, monthly through-the-roof tank inspections, throughputs, and monthly storage temperatures and vapor pressures.
Part 5.C.06a (<i>Informational</i>)	06	N/A	N/A	N/A
Part 5.C.06b (<i>Informational</i>)	06	N/A	N/A	N/A

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 5.C.06c, Condition 06.1	06		X	<u>Limits/Standards:</u> Compliance with the 40% opacity limit was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Only VOC emissions from tank. No monitoring is required.
Part 5.C.06c, Condition 06.2	06		X	<u>Limits/Standards:</u> Compliance with the Standard 5.0, Part O fixed roof tank requirements and routine tank inspections were determined as listed below: <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of out-of-service tank seal inspections, monthly through-the-roof tank inspections, throughputs, and monthly storage temperatures and vapor pressures.
Part 5.C.07a (<i>Informational</i>)	07	N/A	N/A	N/A
Part 5.C.07b (<i>Informational</i>)	07	N/A	N/A	N/A
Part 5.C.07c, Condition 07.1	07		X	<u>Limits/Standards:</u> Compliance with the 40% opacity limit was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Only VOC emissions from tank. No monitoring is required.
Part 5.C.06c, Condition 07.2	07		X	<u>Limits/Standards:</u> Compliance with the Standard 5.0, Part O fixed roof tank requirements and routine tank inspections were determined as listed below: <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of out-of-service tank seal inspections, monthly through-the-roof tank inspections, throughputs, and monthly storage temperatures and vapor pressures.
Part 5.D, Condition 5.D.1	Facility Wide		X	<u>Limits/Standards:</u> Compliance with the facility VOC emissions limitations was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of facility throughput records. Annual fuel throughputs were submitted with the semi-annual deviation report dated April 29, 2020 (for the semi-annual reporting period October 1, 2019 – March 31, 2020).

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 5.D, Condition 5.D.2	Facility Wide		X	<u>Limits/Standards:</u> Compliance with the facility HAP emissions limitations was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of facility throughput records and stack testing results.
Part 5.D, Condition 5.D.3	Facility Wide		X	<u>Limits/Standards:</u> Compliance with the facility limitation of 250 tons per year for both terminals was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review of facility throughput records and stack testing results.
Part 5.D, Condition 5.D.4	Facility Wide		X	<u>Limits/Standards:</u> The reasons why the facility is not subject to MACT Subparts A and R was determined as listed below. <u>Testing:</u> Not Required <u>Monitoring/Record Keeping/Reporting/Other:</u> Records review the original MACT applicability determination submitted to SC DHEC in 1996 and a subsequent determination made in 2014, current records of emissions submitted to SC DEHEC, and the emissions limitations that the facility has submitted for the current air permit.
Part 6.A	N/A	N/A	N/A	Noted as “Not Applicable” in the permit.
Part 6.B	N/A	N/A	N/A	Noted as” Not Applicable” in the permit.
Part 6.C	N/A	N/A	N/A	Noted as “No shield requested”.
Part 6.D	N/A	N/A	N/A	Noted as” Not Applicable” in the permit.
Part 7.A (<i>Informational</i>)	Facility Wide	N/A	N/A	Information notes for due dates of semi-annual Subpart BBBB reports

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 7.B, Condition 7.B.1	Facility Wide		X	All required NESHAP reports and notifications were submitted to SC DHEC as required. Semi-annual GACT Compliance Reports were submitted on July 24, 2019 and January 24, 2020.
Part 7.B, Condition 7.B.2	Facility Wide		X	All required NESHAP reports and notifications that were required by EPA were submitted.
Part 7.C, Affected Sources (<i>Informational</i>)	01, 02, 03, 05, 06, 07	N/A	N/A	Informational table that details each affected emissions source.
Part 7.C, Condition 7.C.1	All Sources		X	Review of NOCS documents.
Part 7.C, Condition 7.C.2	All Sources		X	Records review of facility inspections, maintenance records, and submitted reports.
Part 7.C, Condition 7.C.3	02, 03, 06, 07		X	Records review and tank inspection schedule up to March 31, 2020.
Part 7.C, Condition 7.C.4	05		X	Records review of tank inspections.
Part 7.C, Condition 7.C.5	01		X	Records review of throughput, truck tank tightness certifications and electronic interlock system, stack test information, and maintenance logs.
Part 7.C, Condition 7.C.6	All Sources		X	Records review of monthly loading rack and facility inspections, leak logs, and any notifications.

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 7.C, Condition 7.C.7	01		X	Review of design criteria for parameter monitoring and interlock system. Flame presence is monitored as well as the assist-air blower and the vapor line. An interlock system will restrict truck loading if the monitored parameters are not met. Records review of semi-annual preventive maintenance checks and shut-down logs.
Part 7.C, Condition 7.C.8	01		X	No parameter changes have been made since the original GACT stack test.
Part 7.C, Condition 7.C.9	01		X	The vapor control system and the VCU have automated parameter monitoring and an interlock system that restricts truck loading if the parameters are not met. VCU shutdowns are noted in a log.
Part 7.C, Condition 7.C.10	02, 03, 05, 06, 07		X	Records review of annual tank seal inspections.
Part 7.C, Condition 7.C.11	01		X	Truck drivers submit the annual certification test to Magellan and the trailers are entered into an electronic terminal automation system (TAS) that locks out the truck trailers if the certification is not current.
Part 7.C, Condition 7.C.12	01, 02, 03, 05, 06, 07		X	Magellan conducted the last performance test on June 5, 2019 and submitted the test report to the SC DHEC.
Part 7.C, Condition 7.C.13	02, 03, 05, 06, 07		X	Records review. Magellan keeps Subpart BBBBBB records as required.
Part 7.C, Condition 7.C.14	01		X	Records review and system design. Magellan has an automated interlock system and keeps paper records of the annual truck trailer certifications.
Part 7.C, Condition 7.C.15	01		X	Records review. Magellan keeps a diagram of the facility equipment in gasoline service and keeps leak logs as required.

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Part 7.C, Condition 7.C.16	01		X	Records review. Magellan tracks truck loading and a parameter monitoring system will restrict loading if a parameter condition is not met. VCU shutdowns are noted in a log. A copy of the monitoring and inspection plan is kept at the facility.
Part 7.C, Condition 7.C.17	All sources		X	Semi-annual GACT Compliance Reports were submitted on July 24, 2019 and January 24, 2020.
Part 7.C, Condition 7.C.18	All sources		X	Records review. Semi-annual reports are submitted as required. If needed, reports will include updates on tanks, deviations, malfunctions, leaks in excess of 15 days, and any excess emissions as required.
Part 7.C, Condition 7.C.19	All sources		X	Records review. Magellan submits semi-annual reports with required information. If needed, reports will include malfunctions.
Part 8.A (<i>Informational</i>)	All sources	N/A	N/A	Schedule for quarterly and semi-annual reports.
Part 8.B (<i>Informational</i>)	All sources	N/A	N/A	Schedule for annual reports.
Part 8.C, Condition 8.C.1	All sources		X	Reports are submitted on time as required.
Part 8.C, Condition 8.C.2	All sources		X	Reports are submitted to SC DEHC Technical Management Section
Part 8.C, Condition 8.C.3	All sources		X	Annual compliance reports are submitted to SC DHEC and EPA as required. For the previous annual compliance period, the ACC was submitted on April 29, 2019. .

Identify the Permit Term or Condition.	Emissions Unit ID #	For each permit term or condition, indicate the compliance status during the reporting period.		Describe all methods or means you used to determine compliance with the permit term or condition.
		Intermittent Compliance	Continuous Compliance	
Attachment A (<i>Informational</i>)	N/A	N/A	N/A	Modeled emissions rates
Attachment B (<i>Informational</i>)	N/A	N/A	N/A	Insignificant Activities
Attachment C (<i>Informational</i>)	N/A	N/A	N/A	Reserved
Attachment D (Informational)	N/A	N/A	N/A	Reserved
Attachment E (Informational)	N/A	N/A	N/A	Reserved

D. DEVIATIONS FROM PERMIT TERMS OR CONDITIONS

No deviations are being reported for the compliance reporting period

Use the table below to report deviations from permit terms or conditions. Copy this page as many times as needed to include all deviations. Periodic reports previously submitted to the Department identifying deviations may be cross-referenced provided the report includes all the information listed in the table below.

Specific Permit Condition #	Emissions Unit ID #	Description of each deviation from the conditions of the permit AND the submittal date of any report being cross-referenced	Basis for the determination of the deviation	All dates and times of deviations	Identification of the probable cause for the deviation AND any corrective action or preventative measures taken
NA					

Specific Permit Condition #	Emissions Unit ID #	Description of each deviation from the conditions of the permit AND the submittal date of any report being cross-referenced	Basis for the determination of the deviation	All dates and times of deviations	Identification of the probable cause for the deviation AND any corrective action or preventative measures taken